

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT FESOP RENEWAL  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
CITY OF INDIANAPOLIS  
OFFICE OF ENVIRONMENTAL SERVICES**

**Indy Railway Service Corporation  
6111 West Hanna Ave.  
Indianapolis, Indiana, 46241**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

|   |                  |
|---|------------------|
| Operation Permit No.: F097-12773-00265                            |                  |
| Issued by: Original signed by John B. Chavez                      | Issuance Date:   |
| John B. Chavez, Administrator<br>Office of Environmental Services | Expiration Date: |

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**Quarterly Report Form**

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a welding, cleaning, and painting facility for railroad cars.

|                         |   |
|-------------------------|---|
| Authorized individual:  | Calvin T. Morris  |
| Source Address:         | 6111 West Hanna Avenue, Indianapolis, Indiana 46241                             |
| Mailing Address:        | P.O. Box 42331, Indianapolis, Indiana 46242-0331                                |
| SIC Code:               | 4789  |
| Source Location Status: | Marion  |
| County Status:          | Attainment for all criteria pollutants  |
| Source Status:          | Federally Enforceable State Operating Permit (FESOP)<br>Minor Source, Under PSD |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Spray Painting Operation utilizing two (2) airless spray guns identified as Emission Unit ID Spray Painting. Maximum capacity rated at 438 rail cars painted per year or 25 gallons coating applied per rail car. Includes the use of cleanup solvents at a maximum usage of 1150 gallons per year and a maximum density of 7.2 VOC/gallon cleanup solvent. Emission Unit ID Spray Painting exhausting at two (2) stacks, identified as SV<sub>1</sub> and SV<sub>2</sub>.
- (b) One (1) air discharged pneumatic sand blasting operation. Installed 1980.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (1) eight natural gas fired heaters
    - (A) seven (7) 150,000 Btu/hr
    - (B) one (1) 563,000 Btu/hr
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
  - (2) Three fuel-fired heaters
    - (A) two (2) 230,000 Btu/hr
    - (B) one (1) 155,000 Btu/hr

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment, and cutting torches.
- (d) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## **SECTION B            GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4      Enforceability [326 IAC 2-8-6]**

- (e) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the City of Indianapolis Office of Environmental Services.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.



- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and OES within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)  
or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

OES  
Telephone No.: 317/327-2234  
Facsimile No.: 317/327-2274

Failure to notify IDEM, OAQ or OES, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and/or OES determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and/or OES on or before the date it is due.
  - (2) If IDEM, OAQ and/or OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and/or OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and OES, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and OES U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

|               |
|---------------|
| Entire Source |
|---------------|

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.



**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

##### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

#### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

##### **C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (1) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (2) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and/or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis Indiana 46221-2097
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Spray Painting Operation utilizing two (2) airless spray guns identified as Emission Unit ID Spray Painting. Maximum capacity rated at 438 rail cars painted per year or 25 gallons coating applied per rail car. Includes the use of cleanup solvents at a maximum usage of 1150 gallons per year and a maximum density of 7.2 VOC/gallon cleanup solvent. Emission Unit ID Spray Painting exhausting at two (2) stacks, identified as SV<sub>1</sub> and SV<sub>2</sub>.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4 (1)]

Hazardous air pollutant emissions shall be limited as follows:

- (a) The amount of any hazardous air pollutant (HAP) delivered to the applicators plus the amount used for clean-up shall not exceed 9 tons per rolling 12 consecutive month period.
- (b) Any combination of hazardous air pollutants (HAPs) delivered to the applicator plus the amount used for clean-up shall not exceed 24 tons per rolling 12 consecutive month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.2 Particulate Emission Limitations [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the use of two (2) airless spray guns shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Potential PM emissions of the source are less than 40 tons per year, therefore any change or modification which may increase potential emissions from the equipment described in D.2.1 shall obtain prior approval from OAQ and OES.

#### D.1.3 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

#### D.1.4 Volatile Organic Compounds (VOC) Limitations

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.



## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **D.1.5 Record Keeping Requirements**

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- (a) The Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits in Condition D.1.1. The records shall contain a minimum of the following:
  - (1) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
  - (b) The HAP content (weight percent) of each material used;
  - (c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
  - (d) Identification of the facility or facilities associated with the usage of each HAP.
- (a) To document compliance with Conditions D.1.4, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the 3.5 pounds of VOC per gallon of coating excluding water, delivered to a coating applicator established in Condition D.1.4.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The cleanup solvent usage for each month;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.6 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) air discharged pneumatic sand blasting operation. Installed 1980.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID Blasting shall not exceed 4.96 lb/hr when operating at a process weight of 1.33 ton/yr.

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

- (b) Potential PM emissions of the source are less than 40 tons per year, therefore any change or modification which may increase potential emissions from any emission unit at this source shall obtain prior approval from OAQ and OES.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Indy Railway Service Corporation  
Source Address: 6111 West Hanna Ave. Indianapolis, In. 46241  
Mailing Address: P.O. Box 42331 Indianapolis, In. 46242-0331  
FESOP No.: 097-12773-00265

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015**

**100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES  
DATA COMPLIANCE**

**2700 South Belmont Avenue  
Indianapolis, Indiana 46221  
Phone: 317-327-2234  
Fax: 317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Indy Railway Service Corporation  
Source Address: 6111 West Hanna Ave. Indianapolis, In. 46241  
Mailing Address: P.O. Box 42331 Indianapolis, In. 46242-0331  
FESOP No.: 097-12773-00265

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

|   |
|---|
| Date/Time Emergency started:  |
| Date/Time Emergency was corrected:  |
| Was the facility being properly operated at the time of the emergency?    Y    N<br>Describe:   |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:   |
| Estimated amount of pollutant(s) emitted during emergency:  |
| Describe the steps taken to mitigate the problem:   |
| Describe the corrective actions/response steps taken:   |
| Describe the measures taken to minimize emissions:  |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report**

Source Name: Indy Railway Service Corporation.  
Source Address: 6111 West Hanna Ave. Indianapolis, IN. 46241  
Mailing Address: P.O. Box 42331 Indianapolis, IN. 46242-0331  
FESOP No.: F097-12773-00265  
Facility: Emission Unit ID Spray Painting  
Parameter: Single HAP usage  
Limit: Rolling 12 consecutive month period < 9 tpy for single HAP

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

| Month   | Column 1   |     |     | Column 2           |     |     | Column 1 + Column 2 |     |     |
|---------|------------|-----|-----|--------------------|-----|-----|---------------------|-----|-----|
|         | This Month |     |     | Previous 11 Months |     |     | 12 Month Total      |     |     |
| Month 1 | HAP        | HAP | HAP | HAP                | HAP | HAP | HAP                 | HAP | HAP |
|         |            |     |     |                    |     |     |                     |     |     |
| Month 2 |            |     |     |                    |     |     |                     |     |     |
| Month 3 |            |     |     |                    |     |     |                     |     |     |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report**

Source Name: Indy Railway Service Corporation.  
Source Address: 6111 West Hanna Ave. Indianapolis, IN. 46241  
Mailing Address: P.O. Box 42331 Indianapolis, IN. 46242-0331  
FESOP No.: F097-12773-00265  
Facility: Emission Unit ID Spray Painting  
Parameter: Combined HAP usage  
Limit: Rolling 12 consecutive month period < 24 tpy for combined HAPs

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

| Month   | Column 1   | Column 2           | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
|         | This Month | Previous 11 Months | 12 Month Total      |
| Month 1 |            |                    |                     |
| Month 2 |            |                    |                     |
| Month 3 |            |                    |                     |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indy Railway Service Corporation  
Source Address: 6111 West Hanna Ave. Indianapolis, In. 46241  
Mailing Address: P.O. Box 42331 Indianapolis, In. 46242-0331  
FESOP No.: 097-12773-00265

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**



|  |                               |
|--|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

|  |                               |
|--|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

|  |                               |
|--|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis Office of Environmental Services**

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Source Background and Description**

|                              |   |
|------------------------------|---|
| <b>Source Name:</b>          | <b>Indy Railway Service Corporation</b>             |
| <b>Source Location:</b>      | <b>6111 West Hanna Ave., Indianapolis, IN 46241</b> |
| <b>County:</b>               | <b>Marion County</b>                                |
| <b>SIC Code:</b>             | <b>4789</b>   |
| <b>Operation Permit No.:</b> | <b>F097-12773-00265</b>                             |
| <b>Permit Reviewer:</b>      | <b>Scott L. Dombrowski</b>                          |

On May 22, 2002, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Indy Railway Service Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a welding, cleaning, and painting facility for railroad cars. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. No comments were received from the source or the public.

OES and OAQ have made the following updates to incorporate Article 2 rule revisions to the permit. The TSD will remain as it originally appeared when published. Bolded language has been added; language with a line through it has been deleted.

**Change # 1**

The following rule cite will be added to the table of contents and to section B.3 of the permit:

**B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]**

---

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

**Change # 2**

The following language will be deleted from section B.14 of the permit.

**B.14 Emergency Provisions [326 IAC 2-7-16]**

- 
- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation; ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission

limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

**Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP) Renewal**

**Source Background and Description**

|                              |                                  |
|------------------------------|----------------------------------|
| <b>Source Name:</b>          | Indy Railway Service Corporation |
| <b>Source Location:</b>      | 6111 West Hanna Ave.             |
| <b>County:</b>               | Marion                           |
| <b>SIC Code:</b>             | 4789                             |
| <b>Operation Permit No.:</b> | F097-12773-00265                 |
| <b>Permit Reviewer:</b>      | Scott Dombrowski                 |

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from Indy Railway relating to the operation of a welding, cleaning, and painting facility for railroad cars. Indy Railway was issued its initial FESOP 097-5481-00265 on December 23, 1996.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Spray Painting Operation utilizing two (2) airless spray guns identified as Emission Unit ID Spray Painting. Maximum capacity rated at 438 rail cars painted per year or 25 gallons coating applied per rail car. Includes the use of cleanup solvents at a maximum usage of 1150 gallons per year and a maximum density of 7.2 VOC/gallon cleanup solvent. Emission Unit ID Spray Painting exhausting at two (2) stacks, identified as SV<sub>1</sub> and SV<sub>2</sub>.

**Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

- (b) One (1) air discharged pneumatic sand blasting operation. Installed 1980.

There are no new facilities operating at this source during the course of this review.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (1) eight natural gas fired heaters
  - (A) seven (7) 150,000 Btu/hr
  - (B) one (1) 563,000 Btu/hr
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (2) Three fuel-fired heaters
  - (A) two (2) 230,000 Btu/hr
  - (B) one (1) 155,000 Btu/hr
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment, and cutting torches.
- (d) Paved and unpaved roads and parking lots with public access.

### Existing Approvals

FESOP 097-5481-00265, issued on December 23, 1996; and expiring on December 23, 2001.

All conditions from F097-5481-00265, issued on December 23, 1996, were incorporated into this FESOP except the following:

- (1.) Condition D.1.2 Volatile Organic Compound  
That the volatile organic compound emissions shall be limited as follows:
  - (a) The amount of any volatile organic compound (VOC) delivered to the applicators plus the amount used for clean-up shall not exceed 7.56 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.
- (2.) Condition D.1.5 Volatile Organic Compound (VOC) Usage  
That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in this permit. The records shall contain a minimum of the following:
  - (a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
  - (b) The VOC content (weight percent) of each material used;
  - (c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable

Reason not incorporated: Condition D.1.2 and Condition D.1.5 do not apply because the Unrestricted Potential to Emit of VOC's do not exceed the 25 ton per year threshold established in 326 IAC 8-1-6 applicability and unrestricted Potential to Emit is less than 100 tons per year so no limit is necessary. Since Marion County is in attainment for VOC and Ozone, major levels of emissions for VOC's are 100 tons per year. Indy Railway has a potential to emit less than major levels so no limit on VOC's is necessary.

## Enforcement Issue

- (a) IDEM and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*. No new equipment for this facility has been installed. However, the source based previous insignificant activity (ie. Blasting) on PM-10 analysis instead of PM. For the purposes of this renewal, Emission Unit ID Blasting has been incorporated as a significant activity.
- (b) IDEM and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

## Recommendation

The staff recommends to the Administrator that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on October 12, 2000.

There was no notice of completeness letter mailed to the source.

## Emission Calculations

The calculations submitted for Emission Unit ID Blasting by the applicant have been verified and found to be accurate and correct. See Page 1 of 1 in Appendix A of this document for detailed emissions calculations.

## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

| Pollutant       | Unrestricted Potential Emissions<br>(tons/yr) |
|-----------------|---|
| PM              | 39.98   |
| PM-10           | 39.98   |
| SO <sub>2</sub> | 9.01  |
| VOC             | 23.56   |
| CO              | 1.19  |
| NO <sub>x</sub> | 5.42  |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's        | Unrestricted Potential Emissions<br>(tons/yr) |
|--------------|---|
| Xylene       | 11.54   |
| Ethylbenzene | 1.74  |
| MEK          | 6.21  |
| MIBK         | 0.46  |
| Toluene      | 1.13  |
| TOTAL        | 21.08   |

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OES STEPS Summary.

| Pollutant | Actual Emissions (tons/year) |
|-----------|------------------------------|
| PM        | less than 0.0                |
| PM-10     | less than 0.0                |
| VOC       | 1.5                          |

  

| HAPs            | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| m-xylene        | 0.4                          |
| MEK             | 0.5                          |
| Single/Combined | 0.9                          |

## Potential to Emit After Issuance

The source, issued a FESOP on December 23, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F097-5481-00265; issued on December 23, 1996).

|                                 | Potential to Emit After Issuance |                           |                 |                    |    |                 |                                      |
|---------------------------------|----------------------------------|---------------------------|-----------------|--------------------|----|-----------------|--------------------------------------|
| Process/emission unit           | PM                               | PM-10                     | SO <sub>2</sub> | VOC                | CO | NO <sub>x</sub> | HAPs                                 |
| Emission Unit ID Spray Painting | 6-3-2 applies lb/hr limit        | 6-3-2 applies lb/hr limit | —               | 3.5 Lb VOC/ gallon | —  | —               | < 10 t/y single<br>< 25 t/y combined |
| Emission Unit ID Blasting       | 4.96 lb/hr                       | 4.96 lb/hr                | —               | —                  | —  | —               | —                                    |
| Total PTE After Issuance        | < 10 t/y                         | < 10 t/y                  | —               | —                  | —  | —               | < 10 t/y single<br>< 25 t/y combined |

## County Attainment Status

The source is located in Marion County.

| Pollutant       | Status                 |
|-----------------|------------------------|
| PM-10           | unclassifiable         |
| SO <sub>2</sub> | maintenance attainment |
| NO <sub>2</sub> | attainment             |
| Ozone           | maintenance attainment |
| CO              | attainment             |
| Lead            | unclassifiable         |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

## State Rule Applicability - Entire Source

### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source is not subject to the requirements of this rule because the total potential to emit of any regulated pollutant does not exceed the one hundred (100) ton per year limit established in 326 IAC 1-5-2. This source is instead subject to the requirements of 326 IAC 2-8 because of its potential to emit for HAPs.

### 326 IAC 1-6-3 (Preventive Maintenance Plan)

This rule is superceded by 326 IAC 2-8-4(9) which requires the source to maintain a Preventive Maintenance Plan (PMP) on site. Pursuant to 326 IAC 2-8-3(c)(6)(FESOP: Permit Application), the source is not required to submit the plan. However, the PMP maintained on site must meet the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan). The previous FESOP issued to this source, F097-5481-00265, had the requirement included in Condition D.1.7 and is being carried over to this renewal.

### 326 IAC 2-4.1 (New Source Toxics)

The source is not subject to 326 IAC 2-4.1 because the source is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds (VOCs). Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

### 326 IAC 2-8-4 (1) (FESOP)

Pursuant to this rule, the amount of any combination of HAP's delivered to the applicator plus the amount of any combination of HAP's used for clean-up shall be limited to 22 tons per 12 month period rolled. Therefore, the requirements of 326 IAC 2-7 do not apply.



**326 IAC 2-8-5 (Compliance Monitoring Requirements)**

The source is not subject to compliance monitoring requirements because is not required to limit emissions of sulfur dioxide, particulate matter or volatile organic compounds; the condition limiting potential to emit applies to HAPs only.

**326 IAC 5-1 (Visible Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 7-1-1 (Sulfur Dioxide Emission Limitations)**

The source is not subject to the requirements of this rule because the potential to emit of sulfur dioxide does not exceed the twenty-five (25) ton per year threshold established in 326 IAC 7-1-1.

**State Rule Applicability - Individual Facilities**

Emission Unit ID Spray Painting

**326 IAC 6-1 (Particulate Emissions Limitations)**

Marion County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-12 and neither have the potential to emit one hundred (100) tons per year of PM or actuals of ten (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

**326 IAC 6-3-2 (Particulate Emission Limitations)**

Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID Spray Painting shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

The source has demonstrated compliance with this emission unit as per an inspection dated July 9, 2001.

**326 IAC 8-2-9 (Miscellaneous Metal Coating)**

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The source has demonstrated compliance with this requirement by submitting Material Safety Data

Sheets (MSDS) of the coatings used. All of the coatings used contained less than the 3.5 pounds VOC per gallon of coating requirement.

### Emission Unit ID Blasting

#### 326 IAC 6-1 (Particulate Emissions Limitations)

Marion County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-12 and neither have the potential to emit one hundred (100) tons per year of PM or actuals of ten (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

#### 326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-2(c), PM from the Emission Unit ID Blasting shall not exceed 4.96 lb/hr when operating at a process weight of 1.33 ton/yr.

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### **Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows.

The type and amount of coating used, the amount of any single HAP delivered to the applicator, and the amount of any combination of HAPs delivered to the applicator must be monitored and recorded on a monthly basis. Material Safety Data Sheets must be kept on file at the site for each coating used during the quarter being reported.

Excerpt from Title V Air Permit Compliance Monitoring Guidance May 14, 1996.

The requirements for compliance monitoring applies only to those pollutant-specific emissions units that are subject to "applicable requirements" (as defined in 326 IAC 2-7-1(6)) and which are part of a source that, absent federally enforceable limitations, is major source and thus is required to obtain a Part 70 permit.

Although all sources are required to certify compliance of all emission units with applicable requirements, compliance monitoring plans are required only for some units. These are:

- (1) The unit emits particulate matter, sulfur dioxide or volatile organic compounds; and
- (2) The unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance

monitoring plan); or

- (3) The unit has a device to control emissions; and the allowable emissions exceed 10 pounds an hour; or
- (4) The units does not have a control device, and has actual emissions exceeding 25 tons per year.

Additional conditions have been added since the original requirements were specified in the 1996 guidance. Those conditions are as follows:

- (5) or a condition limiting the PTE is the only thing keeping the unit(s) out of an applicable requirement; or
- (6) cases when the compliance inspector thinks compliance monitoring is necessary.

Based on IDEM and OES's review, CM is not required for any emission units based upon the following criteria:

Although Emission Unit ID Spray Painting and Emission ID Blasting emit PM, SO<sub>2</sub>, and VOC's, they are not subject to NSPS or NESHAP requirements and the units do not have control devices with actuals exceeding 25 TPY. Furthermore, the condition limiting potential to emit pertains only to HAPs.

These monitoring conditions are necessary because HAP emissions must be limited to below Title V levels.

## **Conclusion**

The operation of this welding, blasting, cleaning, and painting of railroad cars facility shall be subject to the conditions of the attached proposed FESOP No. F097-12773-00265.

## **APPENDIX A**

Company Name: Indy Railway  
 Plant Location: 6111 West Hanna Ave. Indianapolis, IN.  
 County: Marion  
 Date Received: October 12, 2001  
 Permit Reviewer: Scott L. Dombrowski

Emission Unit ID Blasting  
 Railcar Sandblasting

\* methodology\* during a 16 hour period, 16.5 lbs of dust was collected from each exhaust fan for a total of 35 lbs.  
 Particulate Emission Rate (35lb/16hr) =2.19 lb/, So (2.19/collector efficiency)x(24hr) =2.21 lb/hr total uncontrolled

Collector Efficiency (temporary) 0.99 %  
 Amount Collected 2.19 pounds/hr

|                                       |       |
|---------------------------------------|-------|
| Total uncontrolled PTE PM (lbs/hr) =  | 2.21  |
| Total uncontrolled PTE PM (lbs/day) = | 53.09 |
| Total uncontrolled PTE PM (tons/yr) = | 9.69  |

Emission Unit ID Blasting  
 Process Weight Rate

|                             |           |
|-----------------------------|-----------|
| Railcar Weight in lbs =     | 64,000    |
| Processing time in hrs =    | 24        |
| Process Weight in lbs/hr =  | 2666.6667 |
| Process Weight in tons/hr = | 1.33      |

E= allowable rate of emission in pounds per hour  
 P= process weight in tons per hour  
 Formula, E= 4.10 P 0.67

Particulate Emission Rate= 4.96 lb/hr

0265calc.